

Joel E. Tasca
Nevada Bar No. 14124
Madeleine Coles
Nevada Bar No. 16216
BALLARD SPAHR LLP
1980 Festival Plaza Drive, Suite 900
Las Vegas, Nevada 89135
Telephone: 702.471.7000
Facsimile: 702.471.7070
tasca@ballardspahr.com
colesm@ballardspahr.com

*Counsel for Defendants Samuel Bond LLC,
Bearden Insurance Group, Inc., and
Kimeneker Agency, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CRYSTAL POTTER, individually and
on behalf of all others similarly
situated,

Plaintiff,

v.

SAMUEL BOND LLC, BEARDEN
INSURANCE GROUP INC., and
KIMENKER AGENCY INC.,

Defendants.

CASE NO. 2:23-cv-00075-APG-DJA

**DEFENDANTS' UNOPPOSED JOINT
MOTION FOR AN EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S CLASS
ACTION COMPLAINT**

(First Request)

Defendants Samuel Bond LLC (“Bond”), Bearden Insurance Group Inc. (“Bearden”), and Kimenker Agency, Inc. (“Kimenker”) (collectively “Defendants”), pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Rule IA 6-1, respectfully move for an alignment and 30-day extension, from February 16, 2023, of their deadlines to respond to the Class Action Complaint filed by Plaintiff Crystal Potter (“Plaintiff”). In support of this motion, Defendants state as follows:

1. Plaintiff filed her Class Action Complaint on January 15, 2023. ECF 1. Plaintiff served Kimenker with process on January 26, 2023 (ECF 12), Bond on January 28, 2023 (ECF 11), and Bearden on January 30, 2023 (ECF 13). Thus, Kimenker’s current deadline to respond to the Class Action Complaint is February 16,

2023, Bond's is February 18, 2023, and Bearden's is February 20, 2023. *See* Fed. R. Civ. P. 12(a)(1)(A)(i).

2. In light of the factual and legal complexity of Plaintiff's allegations, Defendants' counsel requires additional time to confer with Defendants, investigate the facts alleged, and prepare an appropriate response to the Class Action Complaint.

3. Accordingly, Defendants seek an alignment and a 30-day extension of their deadlines—starting from February 16, 2023 (the earliest current deadline)—to respond to Plaintiffs' Class Action Complaint.

4. This is Defendants' first requested extension of time in this case. This motion is not made for delay or any other improper purpose but only to promote orderly resolution of issues in this case.

5. Plaintiff's counsel does not oppose Defendants' requested extension.

WHEREFORE, Defendants respectfully request that the Court enter an order aligning and extending the time by which Defendants must file their response to Plaintiff's Class Action Complaint for 30 days from February 16, 2023.

DATED: February 15, 2023

BALLARD SPAHR LLP

By: /s/ Madeleine Coles

Joel E. Tasca

Nevada Bar No. 14124

Madeleine Coles

Nevada Bar No. 16216

1980 Festival Plaza Drive, Suite 900

Las Vegas, Nevada 89135

Counsel for Defendants

ORDER

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: February 16, 2023

CERTIFICATE OF SERVICE

I hereby certify that on February 15, 2023, I served the foregoing
**DEFENDANTS' UNOPPOSED JOINT MOTION FOR AN EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S CLASS ACTION COMPLAINT** on the following parties
by filing the same with the Court's CM/ECF system:

Anthony I. Paronich
BRODERICK & PARONICH, PC
99 High St Ste 304
Boston, Massachusetts 02110

Timothy J. Sostrin
KEOGH LAW, LTD
55 W. Monroe St., Ste 3390
Chicago, Illinois 60603

Jeffrey A. Cogan
JEFFREY A. COGAN ESQ LTD
1057 Whitney Ranch Drive, Suite 350
Henderson, Nevada 89014

Attorneys for Plaintiff

By: /s/ M.K. Carlton
An employee of Ballard Spahr